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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,
24 Defendant.
25
26

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
ARTURO J. GONZALEZ IN
SUPPORT OF DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S OPPOSITION
TO WAYMO'S MOTION FOR
CONTINUANCE OF TRIAL DATE**

Judge: The Honorable William Alsup
Trial Date: October 10, 2017

27
28 **REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED**

1 I, Arturo J. González, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in
3 good standing of the Bar of the State of California. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and
6 Ottomotto LLC's Opposition to Waymo's Motion for Continuance of Trial Date.

7 2. Since the Federal Circuit's decision, Uber has provided deposition dates for
8 5 deponents. Waymo has rejected these dates.

9 3. Once the Federal Circuit issued its decision, Uber produced the Stroz Report and
10 its exhibits within hours.

11 4. Uber produced its Stroz-related documents the day after the Federal Circuit's
12 decision.

13 5. MoFo made the [REDACTED] from the Stroz database that are in its files available for
14 review on September 17, 2017. MoFo received these [REDACTED] on behalf of Mr. Levandowski *after*
15 Google filed its arbitrations against him.

16 6. Attached as **Exhibit 1** is a true and correct copy of a deposition exhibit number
17 743, marked at the deposition of Adam Bentley, taken on August 22, 2017.

18 7. Attached as **Exhibit 2** is a true and correct copy of a document produced in this
19 litigation bearing Bates number UBER00319640-UBER00319669.

20 8. Attached as **Exhibit 3** is a true and correct copy of a document produced in this
21 litigation bearing Bates number UBER00319664.

22 9. Attached as **Exhibit 4** is a true and correct copy of a document produced in this
23 litigation bearing Bates number UBER00319665.

24 10. Attached as **Exhibit 5** is a true and correct copy of a document produced in this
25 litigation bearing Bates number UBER00319666.

26 11. Attached as **Exhibit 6** is a true and correct copy of a document produced in this
27 litigation bearing Bates number UBER00319667.

12. Attached as **Exhibit 7** is a true and correct copy of a document produced in this litigation bearing Bates number UBER00319668.

13. Attached as **Exhibit 8** is a true and correct copy of excerpts from the deposition of Rhian Morgan, dated April 14, 2017.

14. Attached as **Exhibit 9** is a true and correct copy of excerpts from the deposition of Rhian Morgan, dated August 28, 2017.

15. Attached as **Exhibit 10** is a true and correct copy of a document produced in this litigation bearing Bates number WAYMO-UBER-00086796-WAYMO-UBER-00087999.

16. Attached as **Exhibit 11** is a true and correct copy of excerpts from the Expert Report of Michael J. Wagner, dated August 24, 2017.

17. Attached as **Exhibit 12** is a true and correct copy of a document produced in this litigation bearing Bates number UBER0022196-UBER00022199.

18. Attached as **Exhibit 13** is a true and correct copy of a document produced in this litigation bearing Bates number UBER0022246.

19. Attached as **Exhibit 14** is a true and correct copy of a document produced in this litigation bearing Bates number WAYMO-UBER-00022288-WAYMO-UBER-00022289.

20. Attached as **Exhibit 15** is a true and correct copy of an email from Maxwell Pritt, counsel for Uber to Andrea Roberts, counsel for Waymo, dated September 15, 2017.

21. Attached as **Exhibit 16** is a true and correct copy of excerpts from the Reply
Expert Report of Lambertus Hesselink, Ph.D., dated September 14, 2017.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of September, 2017 at San Francisco, California.

/s/ Arturo J. Gonzàlez

ARTURO J. GONZÀLEZ